KATE L. Mater 323 361-00216-RGK Document 61 Filed 01/22/24 Page 1 of 1 Page ID #:232 DEPUTY FEDERAL PUBLIC DEFENDER 321 EAST 2ND STREET LOS ANGELES, CA 90012 KATE MORRIS@FD.ORG (213) 894-2854 UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CASE NUMBER UNITED STATES OF AMERICA, **PLAINTIFF** 23-CR-00216-RGK v. PHILIP ALAN DRECHSLER APPLICATION FOR REVIEW/RECONSIDERATION OF ORDER **SETTING CONDITIONS OF** RELEASE/DETENTION DEFENDANT. (18 U.S.C. §3142) AND REQUEST FOR HEARING Application is made by □ plaintiff ☑ defendant PHILIP ALAN DRECHSLER that a hearing be held to review /reconsider the decision of ☐ United States District Judge by order dated: Magistrate Judge ALKA SAGAR by order dated: JUNE 6, 2023 denying release and imposing detention under subsection □ (d) or **(e)** of Title 18 U.S.C. §3142; or □ ordering release upon certain conditions, or ☐ denying detention. This application is made 

✓ pre-sentence □ post-sentence based on the following facts not previously considered by said judicial officer or changed circumstances as follows: The defense appeals the Magistrate Judge's denial of bond. Relief sought (be specific): (1) \$15,000 appearance bond signed by Jon Werner, plus \$20,000 cash deposit by Mr. Drechsler within one week of release; (2) Home incarceration at Extended Stays America apartment hotel; (3) Travel restricted to C.D. Cal. and passport surrender; (4) Location monitoring with ankle monitor; (5) No contact with wife M.D. and daughter J.D.; (6) All conditions relating to cases involving sex-offense allegations; (7) No internet-enabled devices; (8) No firearms Counsel for the defendant and plaintiff United States Government consulted on January 22, 2024 and opposing counsel declines to stipulate to an order providing the relief sought. ▼ Telephonic notice given to □ AUSA □ Defendant's Counsel ▼ PSA □ Interpreter □ USM □ Probation on January 22, 20<u>24</u>\_\_\_\_\_\_\_. An interpreter is □ required ☑ not required. Language Defendant is **▼** in custody □ not in custody. 1/22/2024 /s/ Kate L. Morris

Moving Party

Date